

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

ELLIOTT GREENLEAF, P.C.

By: Deirdre M. Richards, Esquire

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Attorney for Tokyo Century (USA) Inc.

In re:

703 BAKERY CORP.

Debtor.

Case No.: 24-1510-VFP

Chapter: 11

Judge: Vincent F. Papalia

**CONSENT ORDER RESOLVING MOTION FOR STAY RELIEF  
AS TO TOKYO CENTURY (USA), INC.**

The relief set forth on the following page, numbered two (2) and three (3) is hereby **ORDERED**.

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Judge Vincent F. Papalia

Debtor: 703 Bakery Corp.

Case No.: 24-15150 (VFP)

Caption: Consent Order Resolving Motion for Stay Relief as to Tokyo Century (USA), Inc.

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THIS MATTER, having been brought before the Court upon the motion filed by Tokyo Century (USA), Inc.. for the entry of an order vacating the automatic stay regarding one (1) 2012 Isuzu NQR VIN No.: JALE5W168C7900734 with 16' Insulated Van Body ("Isuzu") and one (1) 2022 Ford Transit 250 VIN No.: 1FTBR387nKA85205 ("Ford") and the parties having consented to the form and entry of this Consent Order; and the parties having stipulated and agreed that:

- A. Debtor, 703 Bakery Corp., which filed for protection under Chapter 11 (Subchapter V) of the Code on May 21, 2024, is the lessee of Isuzu Ford.
- B. On October 30, 2024, this Court entered its form Order providing Tokyo Century with Relief from the Automatic Stay after Movant filed a Certification of No Objection and Debtor stated it did not oppose the Motion.
- C. Debtor promised to return the vehicles, but to date, the Isuzu is at a garage charging storage of \$90.00 per day with a total due for storage of \$4,026.00 as of September 25, 2024 such that the Administrative Claim is approximately \$6,930 as of December 11, 2024, the date of filing this consent order. The Movant is seeking to obtain the return of the Ford that is allegedly at a location of 624 Page Ave., Lyndhurst, NJ 07071.
- D. Although it has abandoned the Collateral, Debtor agrees that it will cooperate in returning the Isuzu and the Ford (the "Collateral") to Tokyo Century.
- E. Debtor agrees to provide and Tokyo Century has an Allowed Administrative Claim for all storage fees of at least \$6,930, and until the Confirmation Order in this case and that this will be incorporated in the Amended Plan.

Debtor: 703 Bakery Corp.

Case No.: 24-15150 (VFP)

Caption: Consent Order Resolving Motion for Stay Relief as to Tokyo Century (USA), Inc.

**IT IS HEREBY ORDERED THAT:**

1. Although it has abandoned the Collateral, Debtor may cooperate with respect to the return of the Collateral to Tokyo Century because Tokyo Century has Relief from the Automatic Stay, and shall provide Tokyo Century with an Allowed Administrative Claim in the amount of at least \$6,930.00 and \$90.00 per day thereafter until the date of the Confirmation Order. The undersigned consent to the form and entry of this Order.

Attorneys for Tokyo Century  
(USA), Inc.

By: /s/ Deirdre M. Richards  
Deirdre M. Richards,  
Dated: December 11, 2024

MCMANIMON, SCOTLAND &  
BAUMANN, LLC Associates, Inc.  
Attorneys for Debtor

By: /s/ Sari B. Placona  
Sari B. Placona, Esq.  
Dated: December 11, 2024